



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-3

March 29, 2001

Demarus Carlson, Treasurer  
Nebraska Republican Federal Campaign  
Committee  
421 S. 9<sup>th</sup> Street, Suite 233  
Lincoln, NE 68508

Identification Number: C00032334

Reference: October Quarterly Report (7/1/00-9/30/00)

Dear Mr. Carlson:

On March 7, 2001 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your March 26, 2001 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-The beginning cash balance of this report should equal the ending balance of your Amended 2000 July Quarterly Report dated 12/6/2000. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-The totals listed on Lines 11(a)(i), 11(a)(ii), 11(a)(iii), 11(d), 18, 19, 20, 21(a)(i), 21(a)(ii), 21(c), 30 and 31, Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

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-Please amend your report by providing the full name, address, purpose and event name, if applicable, for each disbursement itemized on Schedules B and H4 supporting Line 21.

-Your EVENT YEAR-TO-DATE calculations for Administrative/Voter Drive are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct EVENT YEAR-TO-DATE totals.

-On Schedule H2, you disclose the ratio for VICTORY 2000 BBQ to be REVISED; however, Schedule H2 of your Amended 2000 July Quarterly Report dated 12/6/2000 disclosed a ratio for this activity/event which is identical to the one given in this report. Please amend your report to clarify this discrepancy. 11 CFR §104.10(a)(1)

-On Schedule H2, you disclose the ratio for SBM6 to be NEW; however, Schedule H2 of your Amended 2000 July Quarterly Report dated 12/6/2000 disclosed a ratio for this activity/event which is identical to the one given in this report. Please amend your report to clarify this discrepancy. 11 CFR §104.10(a)(1)

-Schedule A supporting Line 12 discloses a transfer(s)-in from the National Republican Senatorial Committee. Schedule H4 supporting Line 21(a) reflects payments for "lapel stickers", "balloons", "signs" and "yard signs". It appears that you have moved these disbursements from Schedule B to Schedule H4; however, you still need to clarify that these payments meet the definition of "exempt" activity. Please be advised that a state or local party committee may pay for campaign materials (such as bumper stickers) that are distributed by volunteers in connection with activity on behalf of the party's nominees in a general election. Payments for this type of

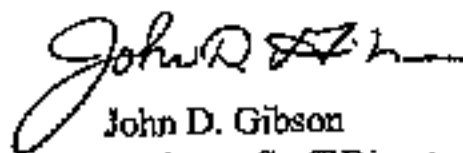
activity are exempt from the definition of a contribution or expenditure if certain conditions are met. The conditions are that no public advertising may be used, including distribution by direct mail (mailings by a commercial vendor or from commercial lists); all funds used for the activity must be permitted under the Act; none of the funds used may have been designated for a particular candidate; and finally, payments for the activity may not be made from transfers-in from the national committee to specifically fund the activity. For further guidance, please refer to 11 CFR § 100.7(b)(15) and (17) and to the Campaign Guide for Party Committees.

Please clarify the nature of the transfer(s)-in and subsequent payments for the aforementioned disbursement(s). If the activity disclosed on your report does not meet the definition of "exempt" activity as described above and if any portion of the expenditures were made on behalf of specifically identified candidates, that amount must be disclosed on Schedule B or F supporting Line 23 or 25 of the Detailed Summary Page as appropriate.

An adequate response must be received at the Commission by April 18, 2001. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions for time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

If you should have any questions related to this matter, please contact Dominick Ciaraldi on our toll-free number (800) 424-9530 (a the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,



John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

